

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA, *ex rel.*,
DILBAGH SINGH, M.D.,
PAUL KIRSCH, M.D.,
V. RAO NADELLA, M.D., and
MARTIN JACOBS, M.D.,

Relators,

v.

Civil Action No. 04-186E

BRADFORD REGIONAL
MEDICAL CENTER,
V & S MEDICAL ASSOCIATES, LLC,
PETER VACCARO, M.D.,
KAMRAN SALEH, M.D.,
and DOES I through XX,

Defendants.

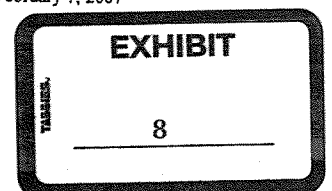
RESPONSES TO RELATORS' FIRST SET
OF INTERROGATORIES
TO BRADFORD REGIONAL MEDICAL CENTER

The Defendant Bradford Regional Medical Center, Inc. ("BRMC"), through its undersigned counsel, responds as follows to the Relators' First Set of Interrogatories:

I. GENERAL OBJECTIONS

- A. Defendant BRMC objects generally to each Interrogatory to the extent that it seeks information that: (1) was prepared in anticipation of litigation or for trial by or for Defendant's attorneys; (2) constitutes the work product of the Defendant's attorneys; (3) constitutes confidential communications between the Defendant and its attorneys; (4) is otherwise privileged according to law, including but not limited to the

159829.1
February 7, 2007



11. If BRMC's defense includes reliance on the advice of counsel, identify all communications to or from counsel regarding BRMC's relationship with V&S, Vaccaro, and Saleh, providing the date of the communication, the participants in the communication, the form of communication (whether by letter, email, memorandum, telephone, face-to-face, or otherwise), and a detailed description of the subject matter of the communication.

Response:

Objection. This Interrogatory is vague, overly broad and unduly burdensome. Furthermore, the information sought is subject to the attorney-client privilege. To the extent that BRMC subsequently determines to argue reliance on advice of counsel as part of its defense of good faith, BRMC shall supplement this Response.

This 7th day of February, 2007.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Ian Donaldson', written over a horizontal line.

Ian Donaldson
Pennsylvania ID No. 203827
HORTY, SPRINGER & MATTERN, P.C.
4614 Fifth Avenue
Pittsburgh, PA 15213
Phone: (412) 687-7677
Fax: (412) 687-7692
idonaldson@hortyspinger.com
Attorneys for Defendant

AFFIDAVIT

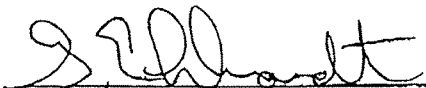
State of Pennsylvania

County of McKean

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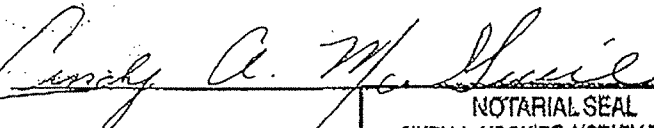
George Leonhardt, being duly sworn upon his oath, deposes and says:

I am the President of Bradford Regional Medical Center ("the Hospital"), Defendant in the above-entitled action and I am authorized to act on behalf of the Hospital. I have read the interrogatories served upon the Hospital by Plaintiffs. The foregoing answers to those interrogatories are true according to the best of my knowledge, information, and belief.


George Leonhardt

Subscribed and sworn to be before me a Notary Public for the State of Pennsylvania,
this 7 day of February 2007.

[seal]


My commission expires: 